

EXHIBIT A

William S. Gyves

From: info@stopdevry.com
Sent: Sunday, December 15, 2013 10:45 PM
To: JFlaherty@RossU.edu; NPerri@RossU.edu; EFernandez@RossU.edu; BlandD@GAO.GOV; CraddockC@GAO.GOV; oig.hotline@ed.gov; TShepherd@DeVryMedical.org; khundley@sptimes.com; mdcunha@acmedctr.org; jreed@bergenregional.com; llo@chpnet.org; William S. Gyves; JFlaherty@RossU.edu; NPerri@RossU.edu; EFernandez@RossU.edu; BlandD@GAO.GOV; CraddockC@GAO.GOV; oig.hotline@ed.gov; TShepherd@DeVryMedical.org; khundley@sptimes.com; mdcunha@acmedctr.org; jreed@bergenregional.com; llo@chpnet.org
Cc: JFlaherty@RossU.edu; NPerri@RossU.edu; EFernandez@RossU.edu; BlandD@GAO.GOV; CraddockC@GAO.GOV; oig.hotline@ed.gov; TShepherd@DeVryMedical.org; khundley@sptimes.com; mdcunha@acmedctr.org; jreed@bergenregional.com; llo@chpnet.org; kbm9003@nyp.org; failony@ccf.org; Elizabeth.Damato@nychhc.org; csamson@nomc.org; backe@ellishospital.org; cjames.flushing@jhmc.org; grimea@holycrosshealth.org; rvanness@solarishs.org; bshaw@libertyhcs.org; duclosa@kernmedctr.com; msprogram@kernmedctr.com; yspeight@kingsbrook.org; Wilmary.robles@nychhc.org; mavega@chpnet.org; rotations@lmcmc.com; tmarshall@maimonidesmed.org; mvera@maimonidesmed.org; clemm2003@yahoo.com; Danays.fleitas@mch.com; kfiore@sbhcs.com; Elizabeth.Siccone@atlantichhealth.org; SGUSOM@mountainsidehosp.com; gishkanian@optonline.net; Tma9002@nyp.org; Ros9114@nyp.org; Chrobinson@sbhcs.com; moira.barber@norwalkhealth.org; peggy.liddy@ahsys.org; sonja.brown@stjohn.org; morrispa@nychhc.org; DMangold@RUMCSL.org; dlikon@sbhcs.com; lvasquez@sjgh.org; rsullivan@sshsw.org; medicine@sshsw.org; mmanzari@nshs.edu; gordont@dnhm.state.md.us; whitej@dnhm.state.md.us; dtandler@che-east.org; jennifer.donnely@stjohn.org; rossuniversityfraud@yahoo.com; Anne.Dwyer@stjohn.org; MCCALLDY@trinity-health.org; Kozdembd@sjhmc.org; dicensor@sjhmc.org; tsarao@smmcnj.org; cleonard@trinitas.org; sgsomvghelective@gmail.com; CherylChermain.Cross@woodhullhc.nychhc.org; medstudents@ccf.org; rcrmcwebmaster@co.riverside.ca.us; sylvia.perez@chw.edu; complaint@jointcommission.org; msprogram@kernmedctr.com; Julissa.DelaTorre@chw.edu; hdyer@rossmed.edu.dm; cferdinand@rossmed.edu.dm; sfitzgerald@rossmed.edu.dm; sfox@rossmed.edu.dm; rgee@rossmed.edu.dm; sgnecco@rossmed.edu.dm; pgoff@rossmed.edu.dm; lgolub@rossmed.edu.dm; vgowda@rossmed.edu.dm; lgowda@rossmed.edu.dm; mgrogan@rossmed.edu.dm; mpmhall@rossmed.edu.dm; lhawley@rossmed.edu.dm; mjohannessen@rossmed.edu.dm; rkalliecharan@rossmed.edu.dm; skelley@rossmed.edu.dm; skoenig@rossmed.edu.dm; jkolli@rossmed.edu.dm; skolli@rossmed.edu.dm; elambert@rossmed.edu.dm; nlarsen@rossmed.edu.dm; jlawson@rossmed.edu.dm; gmallik@rossmed.edu.dm; smallik@rossmed.edu.dm; amartin@rossmed.edu.dm; fmartinez@rossmed.edu.dm; rmcintyre@rossmed.edu.dm; GMeisenberg@rossmed.edu.dm; mmoore@rossmed.edu.dm; tmusial@rossmed.edu.dm; masiiri@rossmed.edu.dm; jnine@rossmed.edu.dm; pocallaghan@rossmed.edu.dm; oodonoghue@rossmed.edu.dm; eodutola@rossmed.edu.dm; dpederson@rossmed.edu.dm; pricketts@rossmed.edu.dm; mriviere@rossmed.edu.dm; prockett@rossmed.edu.dm; droyer@rossmed.edu.dm; dsacks@rossmed.edu.dm; msacks@rossmed.edu.dm; jsands@rossmed.edu.dm; hschiff@rossmed.edu.dm; cschipul@rossmed.edu.dm; eschlegel@rossmed.edu.dm; nselfridge@rossmed.edu.dm; hshams@rossmed.edu.dm; dsharma@rossmed.edu.dm; msheakley@rossmed.edu.dm; cslooma@rossmed.edu.dm; jsmolanoff@rossmed.edu.dm; vthomas@rossmed.edu.dm;

Cc: mthomas@rossmed.edu.dm; kthompson@rossmed.edu.dm; jturnbull@rossmed.edu.dm; muddin@rossmed.edu.dm; nuebelhart@rossmed.edu.dm; svigh@rossmed.edu.dm; lwelke@rossu.edu; swwhite@rossmed.edu.dm; awilke@rossu.edu; kwinston@rossmed.edu.dm; bwright@rossmed.edu.dm; myakubovskyy@rossmed.edu.dm; ayin@rossmed.edu.dm; rcoutinho@rossu.edu; jjohnson@rossmed.edu.dm; cseidel@rossmed.edu.bs; pconran@rossmed.edu.dm; kMalaker@rossmed.edu.dm; snunn@rossmed.edu.dm; jrios@rossu.edu; jdearmas@rossmed.edu.dm; jelwin@rossmed.edu.dm; rodiamar@rossmed.edu.dm; ipascal@rossmed.edu.dm; hpaul@rossmed.edu.dm; dsantiago@rossmed.edu.dm; sstluce@rossmed.edu.dm; aVillanueva@rossu.edu; sworrel@rossmed.edu.dm; farmour@rossmed.edu.dm; gbenjamin@rossmed.edu.dm; djohnson@rossmed.edu.dm; rkrone@rossmed.edu.dm; llarsen@rossmed.edu.dm; gletang@rossmed.edu.dm; pmeadethomas@rossmed.edu.dm; rschroeder@rossmed.edu.dm; adolberry@rossmed.edu.dm; lcostello@rossmed.edu.dm; mcuffy@rossmed.edu.dm; lcobb@rossmed.edu.dm; fkirera@rossmed.edu.dm; ybarzani@rossmed.edu.dm; dbenadallah@rossmed.edu.dm; kjones@rossmed.edu.dm; smuneer@rossmed.edu.dm; bnugusie@rossmed.edu.dm; npatel@rossmed.edu.dm; hrussell@rossmed.edu.dm; cseeber@rossmed.edu.dm; abateson@RossU.edu; ckeator@rossmed.edu.dm; radams@rossmed.edu.dm; lbuckley@rossmed.edu.dm; RSt.Hilaire@RossMed.edu.dm; nmire@rossmed.edu.dm; vsiddiqui@rossmed.edu.dm; mfahm@rossmed.edu.dm; tgiguere@rossmed.edu.dm; jguzman@rossmed.edu.dm; pmanjinder@rossmed.edu.dm; jthurston@rossmed.edu.dm; ynielsen@rossu.edu; nlynch@rossu.edu; eyao@rossu.edu; landersen@rossu.edu; tharkness@rossu.edu; lmuramoto@rossu.edu; MGarcia@rossu.edu; JDipretoro@rossu.edu; ehealey@rossu.edu; ewasserman@rossu.edu; tciolek@rossu.edu; THueller@rossu.edu; ecoccia@rossu.edu; jrooney@rossu.edu; NGibbs@RossU.edu

Subject: How many more students will have to be ruined financially before Joseph Flaherty is fully satisfied?

Dr. Flaherty,

As a dean of a for-profit medical school with an attrition rate of over 20%, you have brought shame and indignity to Ross University and the medical community.

Your legacy as the dean of Ross University will be remembered as the one who shattered the dreams of many and who profited from all the students who had to live with massive debt and financial ruin.

I have no doubt that your conscious will suffer in this life for the financial crime you committed against all those students who are now left penniless, including myself. There is no justification for what you did, and you are worse than a common criminal.

Mr. Flaherty, it is time for you to step down. If you have any dignity left, you'll cooperate with Congress and the Department of Education's investigations against DeVry, Inc. and all those responsible.

How many more students will have to be ruined financially before you are fully satisfied?

As history has noted, many of journalists in Iran sent to prison for

publications against government and its institutions. If I have to be put in prison in United States for publishing what Ross University did to me, I'll still publish and tell what Ross University did to me.

EXHIBIT B



WHOIS Result for STOPDEVRY.com

You are here: [Home](#) : WHOIS Result for STOPDEVRY.com

Do you [need any help?](#)

Register a Domain
Bulk Domain Register
Dig (DNS) Lookup
WHOIS Lookup
TRACEROUTE
ABR Lookup by Name
ABN Lookup by Number
ACN Lookup

WHOIS Result for STOPDEVRY.com

Domain **STOPDEVRY.com**

WHOIS Lookup

More Details: [Check STOPDEVRY.com](#) [DIG STOPDEVRY.com](#) [Traceroute on STOPDEVRY.com](#)

The following is the result of a WHOIS query on the registry for STOPDEVRY.com.

Changes to a WHOIS result can only be made at your registrar or reseller.

STOPDEVRY.com domain lookup results from whois.launchpad.com server:

Domain Name: STOPDEVRY.COM
Registry Domain ID:
Registrar WHOIS Server: whois.launchpad.com
Registrar URL: LaunchPad.com
Updated Date: 30-Nov-2013
Creation Date: 30-Nov-2013
Registrar Registration Expiration Date: 30-Nov-2014
Registrar: Launchpad, Inc. (HostGator)
Registrar IANA ID: 955
Registrar Abuse Contact Email: abuse@websitewelcome.com
Registrar Abuse Contact Phone: +1.713-574-5287
Registration Service Provided By: LAUNCHPAD.COM, INC.
Domain Status: clientTransferProhibited
Registry Registrant ID: HG_31252004
Registrant Name: Ben Amini
Registrant Organization: None
Registrant Street: 13835 N.Tatum Blvd #9-280
Registrant City: phoenix
Registrant State/Province: AL
Registrant Postal Code: 85032
Registrant Country: US
Registrant Phone: +1.7135745287
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: green973271@yahoo.com
Registry Admin ID: HG_31252006
Admin Name: Ben Amini
Admin Organization: None
Admin Street: 13835 N.Tatum Blvd #9-280
Admin City: phoenix
Admin State/Province: AL
Admin Postal Code: 85032
Admin Country: US
Admin Phone: +1.7135745287
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: green973271@yahoo.com
Registry Tech ID: HG_31252009
Tech Name: Ben Amini
Tech Organization: None
Tech Street: 13835 N.Tatum Blvd #9-280
Tech City: phoenix
Tech State/Province: AL
Tech Postal Code: 85032
Tech Country: US
Tech Phone: +1.7135745287
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: green973271@yahoo.com
Name Server: ns1.hostgator.com
Name Server: ns2.hostgator.com
DNSSEC:Unsigned

The data in this whois database is provided to you for information purposes only, that is, to assist you in obtaining information about or related to a domain name registration record. We make this information available "as is", and do not guarantee its accuracy. By submitting a whois query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to:

- (1) enable high volume, automated, electronic processes that stress or load this whois database system providing you this information; or
- (2) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via direct mail, electronic mail, or by telephone.

When you register a domain at Whois® Bronze hosting is included*



Bronze plans incl:

- cPanel 11
- 100MB disk space
- 1000MB/mo of data
- 2 email a/c




The compilation, repackaging, dissemination or other use of this data is expressly prohibited without prior written consent from us. The Registrar of record is Launchpad, Inc. (HostGator).
We reserve the right to modify these terms at any time.
By submitting this query, you agree to abide by these terms.
URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>
Last update of WHOIS database: Tue Dec 17 14:16:33 GMT 2013

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EXHIBIT C

William S. Gyves

From: Ben Amini <bccpda@yahoo.com>
Sent: Saturday, November 09, 2013 5:44 PM
To: James P. Flynn
Cc: William S. Gyves
Subject: DEMAND FOR PRESERVATION OF ELECTRONICALLY STORED INFORMATION
Attachments: Demand-For-Preservation-ESI.pdf

See Attached.

On Thu, 10/31/13, James P. Flynn <JFlynn@ebglaw.com> wrote:

Subject: RE: Amini
To: "Ben Amini" <bccpda@yahoo.com>
Cc: "William S. Gyves" <WGyves@ebglaw.com>
Date: Thursday, October 31, 2013, 6:42 AM

Mr. Amini,

Have these various "corrected" and "amended" responses concerning the preliminary injunction application been sent to the Court?

Please understand that the Court's orders did not provide for additional sur-reply submissions by you after plaintiffs' reply papers were filed, and plaintiffs' reserve the right to object to their submission.

Jim

James P. Flynn | http://www.ebglaw.com/bio_JFlynn
t 973.639.8285 | f 973.639.8931
mailto:JFlynn@ebglaw.com

One Gateway Center | Newark, NJ 07102
t 973.642.1900 | <http://www.ebglaw.com/>

Think Green. Please consider the environment before you print this message. Thank you.
-----Original Message-----

From: Ben Amini [mailto:bccpda@yahoo.com]
Sent: Wednesday, October 30, 2013 4:49 PM
To: James P. Flynn
Subject: RE: Amini

Mr. Flynn,

The attached is corrected exhibit for the amended response. I mistakenly put summery judgment on exhibit 23 of the other exhibit rather than the preliminary judgment ruling. This exhibit has the preliminary injunction ruling.

Thanks

On Tue, 10/29/13, James P. Flynn <JFlynn@ebglaw.com> wrote:

Subject: RE: Amini
To: "Ben Amini" <bccpda@yahoo.com>
Cc: "William S. Gyves" <WGyves@ebglaw.com>
Date: Tuesday, October 29, 2013, 2:46 PM

Mr. Amini,

So long as your motions are filed with clerk within twenty-one days of October 16 and unless otherwise ordered by the court, your time to answer complaint will be tolled until fourteen days after court decides on those motions. That occurs by operation of the rules, see Fed R Civ P. 12(a)(4), and my consent is unnecessary.

Jim

James P. Flynn | http://www.ebglaw.com/bio_JFlynn
t 973.639.8285 | f 973.639.8931
mailto:JFlynn@ebglaw.com

One Gateway Center | Newark, NJ 07102
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-----Original Message-----

From: Ben Amini [mailto:bccpda@yahoo.com]
Sent: Tuesday, October 29, 2013 5:06 PM
To: James P. Flynn
Subject: Re: Amini

Mr. Flynn,

I am wondering if you would stipulate that I hand in my amended answers after the motions are heard. It is just I am extremely depress and I need some times to get my head around it.

Thanks

On Mon, 10/28/13, James P. Flynn <JFlynn@ebglaw.com>
wrote:

Subject: Amini
To: "bccpda@yahoo.com"
<bccpda@yahoo.com>
Cc: "William S. Gyves" <WGyves@ebglaw.com>
Date: Monday, October 28, 2013, 2:09 PM

Mr. Amini,

Attached is an example of
a notice of motion as required by our local rules,
as
mentioned in my last email.

Further, here is a link to
Federal Rule of Civil Procedure 8(b)--
http://www.law.cornell.edu/rules/frcp/rule_8

Jim

James P. Flynn | Bio

t 973.639.8285 | f
973.639.8931

JFlynn@ebglaw.com

One Gateway Center | Newark, NJ
07102

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William S. Gyves

From: Ben Amini <bccpda@yahoo.com>
Sent: Tuesday, November 05, 2013 12:56 AM
To: James P. Flynn
Cc: William S. Gyves
Subject: Nov-4 Letter Response
Attachments: Nov-4-Letter.pdf

See Attached.

On Thu, 10/31/13, James P. Flynn <JFlynn@ebglaw.com> wrote:

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Cc: "William S. Gyves" <WGyves@ebglaw.com>
Date: Monday, October 28, 2013, 2:09 PM

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William S. Gyves

From: Ben Amini <bccpda@yahoo.com>
Sent: Saturday, November 02, 2013 3:55 AM
To: James P. Flynn
Cc: William S. Gyves; Cotzlaw2@aol.com
Subject: RE: Amini

Your client is becoming very popular over the WWW:

<https://www.facebook.com/pages/Stop-Devry/193945497460064>

What are you going to do? get an injunction against he/she too? Are you going to call them disgruntled dropout too? Are you going to impose prior restraint on them too?

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Cc: "William S. Gyves" <WGyves@ebglaw.com>
Date: Monday, October 28, 2013, 2:09 PM

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or
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intended
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call
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William S. Gyves

From: Ben Amini <bccpda@yahoo.com>
Sent: Wednesday, October 16, 2013 7:26 AM
To: William S. Gyves
Subject: Re: RUSM v. Amini

Gyves,

In order for you to get a TRO, you need to demonstrate three thing:

1- That there is irraprable injury to your client---which you know it is not true and if you claim so, you are acting in bad faith. The website is based on my personal opinion and published articles in the news. So if you are going to make up something, the judge is going to see that you lied to the court.

2-- That the court has jurisdiction. I reside in Arizona, and I don't have any connection with state of NJ. Once I get served with court documents, then I file a motion for a change in venue.

3- That you have a good chance to win the case. I 100% doubt that given the fact that it was your client, intentionally broke the agreement first (I have ample evidence to prove my case against your client), and the agreement was fraud. So I have a major counter claim against your client that must be sorted out first.

I any event, I don't have a phone as I am 100% broke, thanks to your client. But I can use skype and I can call the honorable judge, through your phone, if you send me an email with time and date.

I intend to fight this to the end, as long as it takes. Even though I am a Citizen of Canada and no judgment from US court on matters relating to what your client is alleging is enforceable in Canada (there is not reciprocity in this case), I am going to fight this here because I beleive it is your client which is bogus and defrauded students like me and taxpayers.

Once last note, since English is my second language, I am requesting for an interpreter and translation to Farsi for all your questions.

Have a nice day in the court!

On Wed, 10/16/13, William S. Gyves <WGyves@ebglaw.com> wrote:

Subject: RUSM v. Amini
To: "Ben Amini" <bccpda@yahoo.com>, "unitedstates@cox.net" <unitedstates@cox.net>
Cc: "Cotzlaw2@aol.com" <Cotzlaw2@aol.com>
Date: Wednesday, October 16, 2013, 3:00 AM

Good morning, Mr.

Amini. Please be advised that on behalf of Ross University School of Medicine and Global Education International, Inc., we will be appearing in the United States District Court for the District of New Jersey in Trenton today seeking, by way of an order to show cause, an expedited hearing on our application for preliminary injunctive relief against you and the bogus Ross University websites you have established and are maintaining. We also will be seeking temporary restraints pending the preliminary injunction hearing. Please be guided accordingly. We will forward copies of our papers shortly, and advise of any developments with respect to our application once we file our papers. In the event the judge assigned to our application may wish to hear from you and you are unable to appear today, is there a telephone number we may provide to the Court so the judge can reach you telephonically?

I have copied George Cotz on this email as a courtesy. Based on my recent conversation with Mr. Cotz, I understand that he does not currently represent you.

If I am incorrect in this regard, I ask Mr. Cotz to so inform me. If you have retained new counsel with respect to this matter, please forward his/her contact information so I may reach out to your counsel directly.

Feel free to contact me at your convenience.

William S. Gyves | Bio

t 212.351.3770 | t
973.639.8284 | f
212.878.8600

WGyves@ebglaw.com

250 Park Avenue | New York, NY
10177

t 212.351.4500 | www.ebglaw.com

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William S. Gyves

From: Ben Amini <bccpda@yahoo.com>
Sent: Tuesday, October 15, 2013 7:01 PM
To: William S. Gyves
Subject: Re: Ross University

Mr. Gyves,

As an attorney from New York, I am quite sure you are familiar with rule 8.4 of the NYS rules of professional conduct, and rule 1.6A.

I believe you/your institution/your agents, directly/indirectly, conspired with my former attorney, Colleen Kerwick, to inflict pain and suffering upon me, including violating the non-disparagement agreement that was signed on Feb. 2012. I believe you utilized the information that was provided to you by my former attorney, knowing these information are protected under attorney client privilege clause. Not only you/your institution/your agents used these information as a pretext to retaliate against me, but shared these information with other individuals, third parties, knowing clearly that these information were confidential.

As such, I am filing a complaint against you, and your law firm, with Departmental Disciplinary Committee for the First Department for violation of rule 8.4 of the NYS rules of professional conduct, and rule 1.6A.

Thank you.

On Thu, 10/10/13, William S. Gyves <WGYves@ebglaw.com> wrote:

Subject: Ross University

To: "unitedstates@cox.net" <unitedstates@cox.net>, "bccpda@yahoo.com" <bccpda@yahoo.com>, "info@rossu.net" <info@rossu.net>

Cc: "Cotzlaw2@aol.com" <Cotzlaw2@aol.com>

Date: Thursday, October 10, 2013, 6:19 AM

Please see the attached.

William S. Gyves | http://www.ebglaw.com/bio_WGYves
t 212.351.3770 | t 973.639.8284 | f
212.878.8600
<mailto:WGYves@ebglaw.com>

250 Park Avenue | New York, NY 10177
t 212.351.4500 | <http://www.ebglaw.com/>

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William S. Gyves

From: Ben Amini <bccpda@yahoo.com>
Sent: Thursday, October 10, 2013 6:01 PM
To: William S. Gyves
Cc: Michael Greene; Janet Lorin; cotzlaw2@aol.com; Shillingfordd@cwdom.dm; JFlaherty@RossU.edu; CaseTeams@ed.gov
Subject: Re: Ross University
Attachments: Document.pdf

Here is the attachment of the Ross University hired lynchpin, William Gyves, against a student who is broke, crushed, in \$300,000 debt and his medical career was taken away bu Ross University for trying to expose this institution since 2009, and now trying to take away the last thing that has left for me, my freedom to speak.

On Thursday, October 10, 2013 7:00 AM, Ben Amini <bccpda@yahoo.com> wrote:
Mr. Gyves,

- 1- The agreement you are referring to was signed under duress, as I was forced to sign the agreement to save my medical career against an on going harassmt and retaliation by your client.
- 2- After I transferred to AUA, your client contacted AUA and informed them about the cirmusatance of my tenafer. This lead to direct interference with my medical education at AUA, which subsequently lead to my dismissal from AUA, which is in violation of the agreement you are referring to.
- 3- The content of the website you are referring to is protected under the first amendment of united states for free speech, against a foreign operated for-profit medical school that its parents company, Devry, is currently under investigation by state attorney general and US senate. I will continue to contact the media, the dept of education, the medical board of Dominica, to inform them how your client retaliated against me, against Michael Greene, and many other student. How your client tried to force students to sign a non-dispharagment agreement, like you did to me and Michael Greene, in order to prevent us from complaining against your client(see <http://www.stopdevry.net/lawsuit.html>).
- 4- If I have to go to relocate to another country to protect my first amendment right against Devry or your client, I will.

I am forwarding your email to the reporter at Bloomberg and dept of education.

Have a Nice day!

On Thursday, October 10, 2013 6:19 AM, William S. Gyves <WGyves@ebglaw.com> wrote:
Please see the attached.

William S. Gyves | http://www.ebglaw.com/bio_WGyves
t 212.351.3770 | t 973.639.8284 | f 212.878.8600
<mailto:WGyves@ebglaw.com>

250 Park Avenue | New York, NY 10177
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William S. Gyves

From: Ben Amini <bccpda@yahoo.com>
Sent: Thursday, October 10, 2013 10:01 AM
To: William S. Gyves
Cc: Michael Greene; Janet Lorin; cotzlaw2@aol.com; Shillingfordd@cwdom.dm; JFlaherty@RossU.edu; CaseTeams@ed.gov
Subject: Re: Ross University

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